

AFFIDAVIT
Of
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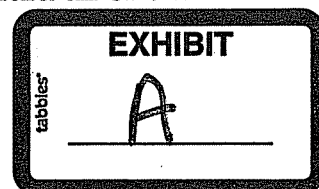
I started at Lexington in September, 1990 as a press operator and I worked as a press operator for, approximately five or six months, then I got into the Quality Department and worked under Lorraine Cerimele.

I was a Quality Technician and did floor audits. I was a Quality Technician up until a point where Lexington was talking about downsizing and Lorraine put me into the Layout Department. I was in the Layout Department approximately three months until I got laid off. I was laid off for approximately one year after that Lorraine called me back to do a job that I've done before with Lexington. I was in SPC {Statistical Process Control} when I went back to Lexington. I did SPC and I helped in layout and this was during the whole time that Lorraine Cerimele was there. Where we enjoyed quality awards.

In approximately 1997 I was put in a position of Document and Data Control where I was in control of all documents in the plant for QS9000. I was in charge of process sheets, material mixing instructions and procedures. I remained in Document and Data Control until I quit in December of 2000.

In my capacity as Document and Data Control my primary responsibility was to maintain the company's records and procedures. I took procedures and documents from all areas; engineering, quality, materials lab and I would maintain these into our computer system per QS9000 standards process sheets, mixing instructions and SPC are all very important documents that have to be controlled, I was the control center for these documents.

In my capacity as document and data control person I was required to run a dual system or have two working sets of documents. One set was the actual or what was really happening and the second set of documents was what I was required to put together and maintain in my system for when customers came in or if we needed documents that would show, oh yes, we are doing things the right way and the way we should. That's what that set of documents was for. It was really complicated and really difficult to maintain these two sets and I would always be nervous and afraid all of the



time when a customer would come in. When we knew a customer was coming in, the engineer would run over to me and say, "OK, we need the customer copy of this process sheet," which was totally fudged and not what we were running at all. I would always be so very nervous because there was always the potential that I would pull from the wrong pile or the wrong set of documents or that I would actually give them what the truth was instead of what the customer was suppose to see. So that was a lot of pressure and it was very, very nerve wracking.

In earlier 1997 when I started in document and data control I was working for Lorraine Cerimele up until December of 1998 until she was fired. During that time there were only duplicate systems run on the SPC or the Statistical Process Control documents. We maintained a dual system on those because we had customers that required SPC, certain customers on certain part numbers required SPC and we were not given the manpower to perform all the SPC that was required and that certainly was not a top priority for Keith Blockinger. So we simply could not do that but yet we had to perform an SPC function for these requirements so we were expected and told to fudge that data to present to the customer or to have it ready when the customer wanted to see it. But at that time up until December, 1998 the only duplicate system that was run was on the SPC. It was common knowledge, from the day you started Lexington, that Keith is in complete charge of that plant of every person in that plant and everything that goes on in that plant. There is literally nothing that happens or nothing that is decided or nothing that goes on in that plant that he is not aware of and that he does not dictate and control. With that said the only person that would challenge Keith was Lorraine Cerimele.

Animosity grew with Keith on the part of Lorraine Cerimele because she would challenge him and it ultimately led to her being fired in December of 1998. Many times on many occasions I would witness Lorraine Cerimele and Keith Blockinger arguing. I couldn't hear what they were saying but it was very visible, very clear, you could tell from their body language they were in Lorraine's office and mouths were flying and hands were flying and it was very obvious that they were arguing and those were the times that Lorraine was challenging what Keith was forcing people to do and as a result of this she was fired. After Lorraine was fired there was no one left in the plant that

challenged Keith Blockinger and that was the whole point, he didn't want anyone to challenge him.

So everything that I did in document and data control and everything that everyone did within that plant we did under Keith's orders and with his knowledge so that when the engineers and the lab personnel would come running to me asking me to put fudged process sheets and fudged material mixing instructions into my document and data control center per Keith, that's exactly what I did. So therefore my dual system now incorporated not just SPC but process sheets and material mixing instructions, as well. When a customer would come in, immediately I would have the engineers running to me saying "Delphi's coming in I need a process sheet---a fudged process sheet that's in your system on these part numbers per Keith and I need them right away because the customer will be in" and I would get those fudged documents together and get them out to the engineer so that they could maintain them on the press. Never in my entire employment with Lexington was I ever questioned, challenged, taken to task or called on the carpet by Keith Blockinger in regards to all of these "fudged" documents.

As a result of this deception it was necessary for me to keep the one document that I would say is the "reality" document of the actual product itself and also to keep various other documents of the same type that would constantly change from time-to-time not based upon the truth but based upon the fiction and to conform to the customer expectations rather than conforming to the facts of what was actually the truth. On various projects I would have four or five papers on the same type of form which were constantly in variance with one another and it was difficult for engineers and people to know which document was the deceitful document that would be shown or used by the customer as opposed to the truthful document that was withheld from the customer. Consequently, I had an obsolete file in which I would place all of these documents by which they would be able to go back in time and point of reference to determine what they had said at any one particular time. The dual system was maintained only with regard to the hard copy and not to the computer system except in engineering.

Engineering had both the true document and the falsified document, however, the control of the documents were at my post. After Lorraine got fired and Gloria

Knight took over it was clear, much more clear, that there was no more buffer between Keith and the quality manager. We knew then that everything was controlled by Keith through Gloria. It got to the point after Lorraine was gone, and Gloria took over where customer complaints went through the roof. There were no more quality awards, QS9000 became harder to maintain. The documents became harder to maintain because there were more areas of falsification of documents with the dual systems that I had to maintain. It got to the point that the pressure and the stress got worse as time went on. I was feeling out of control, like I lost control of my document data control position due to the dual systems that I had to maintain. This later led to my quitting and finding another job. The pressure was just too great. I was out of control in my position and I quit Lexington in December of 2000.

On the topic of cure time reduction, we had a cure time reduction team and the cure time was reduced in order to make more product. My job in the cure time reduction team was SPC, which was the dimensionals of the reduced cure time parts.

A lot of times they failed the SPC, or were out of control, but in the end, regardless of the results, we were all told that these parts were going to be passed anyway. So the entire team got to the point where we didn't want to have these team meetings anymore because it was like a moot point since all these parts were going to be passed anyway no matter what we did.

The quality problems got so bad on one occasion that Blockinger had five semi-trucks come in to remove defective parts and product from the plant while the QS9000 audit was going to be done and an AMP visit was to take place. This is true. They piled the semi's up with the rejected product coming from the inspection room, mostly because the inspection room was so crowded with these defective parts there was no place to hardly walk in the room. So they loaded everything up into these semis and took all these parts away before the QS9000 audit or before AMP got there to do an audit themselves.

All of us in the quality department as well as in other areas of the business experienced this type of conduct on a daily basis. When you have to do so much fudging and deal so much in the deception of things it really gets to you and it would be a very big topic of conversation daily because it just got to the point where you just didn't feel good about what you were doing and you knew when you came into work

everyday what was required and what was demanded of you in order for you to keep your job and that was to fudge information. Eventually you just get numb over the whole experience and we would start joking about it. We started calling ourselves "Misinformation Specialists" because that's what we felt like and I guess it kind of watered down in our own minds for us a little bit of what we were doing but we were specialists and we were misinformation specialists and we got very, very good at it.

Kimberly S. Hunsbarger
KIMBERLY HUNSBARGER

STATE OF OHIO)
) ss.
TRUMBULL COUNTY)

Before me a notary public in and for the above state and county this 2nd day of July, 2001, personally appeared Kimberly Hunsbarger who on her oath did state that the foregoing affidavit is true as she verily believes.



Christina Parrish
NOTARY PUBLIC

CHRISTINA PARRISH, Notary Public
State of Ohio
My Commission Expires 8/11/05